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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO.: 1:19CR00124
Plaintiff,)
v.) JUDGE BENITA Y. PEARSON
ANGEL RIOS,)
JAIME HERNANDEZ-DE LA PAZ,) MOTION TO SEAL SUPERSEDING
FELIX M. CRUZ,) INDICTMENT
EDWIN A. TAVAREZ,)
MIGDALIA PABON,)
EDWIN VASQUEZ,)
MALVIN D. ROMAN,)
Defendants.)

Now comes the United States of America, by and through counsel, Justin E. Herdman, United States Attorney, and Patrick P. Burke, Assistant United States Attorney, and respectfully moves this Court for an order sealing the attached indictment for the following reason(s): Risk of flight and danger to the community.

The government further requests this Court to order that an Assistant United States Attorney of the Criminal Division of the United States Attorney's Office for the Northern District of Ohio may obtain, upon request, a certified copy of this indictment should any defendant be located in another judicial district and a certified copy of this indictment is needed

for forwarding to that judicial district. See Rule 6(e)(4) of the Federal Rules of Criminal Procedure.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney

By: 

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